

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C, 20554**

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| In the Matter of |) | |
| |) | |
| Section 68.4(a) of the Commission's Rules |) | WT Docket No. 01-309 |
| Governing Hearing Aid-Compatible |) | RM-8658 |
| Telephones |) | |
| |) | |

SEMI-ANNUAL REPORT

Owner State Wireless, LLC ("Owner State"), by its attorneys, and pursuant to the Order adopted by the Federal Communications Commission ("FCC" or "Commission") in the above referenced proceeding on August 14, 2003^{1/} and the Public Notice released by the FCC on March 8, 2004^{2/} hereby submits its semi-annual report regarding interoperability between certain digital wireless phones and hearing aids. This report covers the reporting obligation due May 17, 2005. Because this report was not timely submitted on May 17, 2005, Owner State seeks waiver of the FCC's rules to the extent required and asks that the Commission accept this late-filed report.

I. INTRODUCTION

Headquartered in Anchorage, Alaska, Owner State provides 800 MHz Specialized Mobile Radio ("SMR") digital wireless communications service in Alaska only. As the FCC is aware, Owner State recently completed construction of its digital system and became operational as a digital provider on December 30, 2004.^{3/} Because Owner State did not become operational

^{1/} *Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones, Report and Order*, 18 FCC Rcd 16753 (2003) ("HAC Order").

^{2/} "Wireless Telecommunications Bureau Announces Hearing Aid Compatibility Reporting Dates for Wireless Carriers and Handset Manufacturers," *Public Notice*, WT Docket No. 01-309, DA 04-630 (rel. Mar. 8, 2004).

^{3/} *See* Letter from Russell H. Fox to Cyndi Thomas, Assistant Chief, Mobility Division, Wireless Telecommunications Bureau, January 4, 2005.

until December 30, 2004, it was not obligated to file a semi-annual report until the May 17, 2005.

II. SEMI-ANNUAL REPORT

Below is information regarding how Owner State intends to provide hearing aid compatible technologies to customers with disabilities. Owner State has responded to all of the matters set forth in the FCC's *HAC Order*, but has grouped like information together for the FCC's convenience.

Item 1: Digital Wireless Phones Tested. Owner State plans to offer HAC compliant digital mobile handsets as part of its digital iDEN system. Owner State's system will utilize Motorola handsets with iDEN interface. According to Motorola, it currently has four iDEN handsets that are HAC compatible, model numbers i760, i850, i836 and i730.

Issues 2-4, 8-9, and 11: Laboratory Used, Test Results for Each Phone Tested; Identification of Compliant Phone Models and Ratings According to ANSI C63.19; Information Related to Incorporating Hearing Aid Compatibility Features into Newer Models of Digital Wireless Phones; Any Activities Related to ANSI C63.19 or Other Standards Work Intended to Promote Compliance with the FCC's Order; and Ongoing Efforts for Interoperability Testing with Hearing Aid Devices. Owner State is relying on Motorola's testing results and laboratory procedures and will rely on Motorola to identify future compliant phone models and ratings to enable Owner State to provide a handset(s) that complies with the U3 criteria of ANSI C 63.19 within two years and the U3T criteria within three years.^{4/} Owner State will obtain information related to incorporating hearing aid compatibility features into newer models of digital wireless phones as it becomes available from Motorola. Owner State

^{4/} *HAC Order* ¶ 71.

will use this information to assist customers with disabilities to select a digital handset that meets the customer's needs. Owner State will continue to rely on Motorola's and the industry's efforts to develop and implement standards in compliance with the *HAC Order* and the manufacturer's efforts regarding interoperability testing with hearing aid devices.

Issues 5-6: Report on the Status of Product Labeling and Report on Outreach Efforts.

Owner State will work with Motorola to obtain information for consumers with disabilities to allow them to select a handset that best meets their needs. Owner State also will work to develop a means to identify the HAC compliant phones for requesting consumers and audiologists. Owner State will determine the best methods for making this information available and will develop ways to train personnel to assist customers in obtaining compliant digital handsets.

Issues 7 and 10: Information Related to the Retail Availability of Compliant Phones and the Total Numbers of Compliant and Non-Compliant Phone Models Offered. Four HAC compliant handsets are available through Owner State, the Motorola i730, i760, i836 and i850 models. As indicated above, Owner State will work with customers with disabilities to ensure that the customer obtains a digital handset that meets the customer's needs.

III. CONCLUSION

Owner State hereby submits the foregoing semi-annual report regarding its compliance with the FCC's HAC requirements. Owner State will continue to provide the FCC with updated information in future reports. The FCC is asked to direct any questions regarding the report to the undersigned.

Respectfully submitted,

/s/ Russell H. Fox

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